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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

**HEATHER-LYNNE  
VAN WILDE,**

**3:22-cv-01244-AR**

**PLAINTIFF,**

**DECLARATION OF LINH T. VU**

v.

**(In Support of Defendant's Motion for  
Extension of Time to File Appearance)**

**CITY OF PORTLAND, PORTLAND  
POLICE BUREAU OFFICER  
JOHN DOE**

**DEFENDANT.**

I, Linh T. Vu, being first duly sworn, do depose and say:

1. I am the attorney representing City of Portland in the above-entitled matter and I make this declaration in support of defendant's request for an extension of time in which to file an initial appearance.
2. Plaintiff Heather-Lynne Van Wilde filed this case in the United States District Court for the District of Oregon on August 24, 2022.
3. Defendant City of Portland was served with the Summons and Complaint on September 22, 2022.
4. Defendant City of Portland's response to plaintiff's Complaint is due October 13, 2022. In order to conduct a background investigation and prepare and file a meaningful response

to plaintiff's Complaint, defendant City of Portland requests a 30-day extension of time, up to and including November 14, 2022 in which to file a first appearance.

5. Plaintiff's attorneys, Jane L. Moisan, Juan C. Chavez, Franz Bruggemeier and Jonny Gersten, have no objection to this request for an extension of time.

6. This motion is presented in good faith and not for reasons of delay.

**I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.**

DATED: October 12, 2022



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Linh T. Vu